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March 30, 2011

Ex Parte

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *Ex parte* notice—CG Docket No. 10-51

Dear Ms. Dortch:

On March 29, 2011, Mike Maddix of Sorenson Communications, Inc. (“Sorenson”), and Renee Wentzel and I of Wiltshire & Grannis LLP, on behalf of Sorenson, met with Gregory Hlibok and Diane Mason of the FCC’s Disability Rights Office. On March 30, 2011, those same parties met with Angela Kronenberg, Wireline Legal Advisor to Commissioner Clyburn.

During both meetings, Sorenson reiterated its arguments previously made in this proceeding that the Commission should: (1) not prohibit VRS providers from operating call centers in Canada; (2) prohibit so-called “white label” operators from providing VRS service; (3) bar VRS providers from using interpreters working out of their homes; and (4) require automated recording of session and conversation time, while allowing interpreters to supplement automated CDRs by manually coding non-compensable calls as non-billable, as further explained in Sorenson’s *ex parte* letter dated March 21, 2011. Sorenson also pointed out that mandatory FCC certification of VRS providers is not necessary, and could result in unintended consequences, particularly as related to common carrier status. Finally, Sorenson recommended that the Commission consider additional steps to prohibit slamming, and to ensure that VRS providers do not interfere with users’ valid attempts to change their default providers.

During the meeting with Mr. Hlibok and Ms. Mason, the meeting participants also discussed the issue of the compensability of calls to “podcasts,” and the interoperability of Sorenson’s VRS software applications.

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Sincerely,

_____/s/____

John T. Nakahata
Wiltshire & Grannis LLP
Counsel for Sorenson Communications, Inc.

cc: Gregory Hlibok
Diane Mason
Angela Kronenberg